

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

JOSHUA JARRETT, JESSICA JARRETT

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. 3:21-cv-00419

District Judge William L. Campbell Jr.

Magistrate Judge Alistair E. Newbern

**NOTICE OF APPEAL**

Plaintiffs Joshua Jarrett and Jessica Jarrett, by and through their undersigned counsel, hereby appeal to the United States Court of Appeals for the Sixth Circuit the opinion and order dismissing case entered in this action on September 30, 2022 (Dkt. Nos. 65, 66).

Respectfully submitted,

CONSOVOY MCCARTHY PLLC  
Cameron T. Norris  
Jeffrey M. Harris  
1600 Wilson Boulevard, Suite 700  
Arlington, VA 22209  
Telephone: 703.243.9423

FENWICK & WEST LLP  
/s/ David L. Forst  
David L. Forst  
Sean P. McElroy  
Silicon Valley Center

801 California Street  
Mountain View, CA 94041  
Telephone: 650.988.8500  
Facsimile: 650.938.5200

J. Abraham Sutherland  
104 Prospect Street  
Black Mountain, NC 28711  
Telephone: 805.689.4577

DATED: November 21, 2022

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 21, 2022, I electronically filed the foregoing Notice of Appeal with the Clerk of Court using the CM/ECF system, which sent notification to Defendant's Counsel:

**Ryan O'Connor McMonagle**  
**Stephen S. Ho**  
U.S. Department of Justice, Tax Division  
PO Box 227  
Washington, DC 20044  
[Ryan.McMonagle@usdoj.gov](mailto:Ryan.McMonagle@usdoj.gov)  
[Stephen.S.Ho@usdoj.gov](mailto:Stephen.S.Ho@usdoj.gov)

Dated: November 21, 2022

/s/ David L. Forst \_\_\_\_\_